

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**CSX TRANSPORTATION, INC.,
individually and on behalf of
NORFOLK AND PORTSMOUTH BELT LINE
RAILROAD COMPANY,**

Plaintiff,

v.

Civil Action No. 2:18-cv-530-MSD-LRL

NORFOLK SOUTHERN RAILWAY COMPANY, *et al.*,

Defendants.

NOTICE OF NPBL's MOTION TO SEAL

PLEASE TAKE NOTICE THAT Defendant Norfolk and Portsmouth Belt Line Railroad Company, by counsel, pursuant to Local Civil Rule 5 and the Stipulated Protective Order entered on October 29, 2019 (D.E. 79), is moving this Court for leave to file under seal Exhibits A, B, D, G, and H to the memorandum in support of its motion to compel (being filed concurrently herewith), as well as references to the exhibits in the body of the memorandum in support.

- Exhibit A is Plaintiff's objections and responses to the Belt Line's first interrogatories and requests for admission;
- Exhibit B is correspondence from plaintiff's counsel dated July 13, 2020 containing references to and descriptions of documents marked by Plaintiff as confidential;
- Exhibit D is a collection of documents marked by Plaintiff as confidential and/or attorneys' eyes only;
- Exhibit G is Plaintiff's second supplemental answers to the Belt Line's first interrogatories; and
- Exhibit H is a collection of supplemental documents marked by Plaintiff as confidential and/or attorneys' eyes only.

This serves as public notice that the Belt Line is moving to file the above documents under seal. The Belt Line's grounds for seeking leave to file the above documents under seal are set forth in its Motion to Seal and Memorandum in Support.

Dated: July 24, 2020

**NORFOLK AND PORTSMOUTH
BELT LINE RAILROAD COMPANY**

By: /s/ W. Ryan Snow

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CERTIFICATE OF SERVICE

I certify that on this 24th day of July 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a "Notice of Electronic Filing" to all counsel of record who have consented to electronic service.

By: /s/ W. Ryan Snow

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